

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,

V

Case No. 19-20254-01  
Honorable Terrence G. Berg

LINDA WARDLOW,  
Defendant.

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TERE MCKINNEY-BUNDY (P71567)  
JEFFREY L. EDISON  
Attorney for Linda Wardlow  
500 Griswold Street, Suite 2410  
Detroit, MI 48226  
(313) 964-0400  
(248) 808-3225  
[jelee@ix.netcom.com](mailto:jelee@ix.netcom.com)  
[mckinneylawllc@gmail.com](mailto:mckinneylawllc@gmail.com)

RYAN A. PARTICKA  
Assistant U.S. Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
(313) 226-9635  
[ryan.particka@usdoj.gov](mailto:ryan.particka@usdoj.gov)

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**LINDA WARDLOW'S EMERGENCY MOTION TO TRAVEL WHILE ON  
SUPERVISED RELEASE BRIEF CONTAINED THEREIN**

NOW COMES LINDA WARDLOW, by and through her attorney, Tere McKinney-Bundy and in support of her Emergency Motion to Travel While on Supervised Release, states the following:

1. Linda Wardlow pled guilty to a five (5) count Indictment, wherein, she was charged was charged three counts of Mail Fraud, in violation of 18 U.S.C. § 1341; one count of Theft of Government Funds, in violation of 18 U.S.C. § 641; and one count of SSA Representative Payee Fraud, in violation of 42 U.S.C. § 408(a)(5), of the Indictment.

2. On January 2, 2021, Ms. Wardlow, who is 70 years old, voluntarily self-surrendered to FMC Lexington to serve her term of six (6) months imprisonment.

3. On April 28, 2021, this Court granted Ms. Wardlow's Motion for Sentence Reduction. (ECF No. 26, PageID.295.)

4. Pursuant to the Court's Order, Ms. Wardlow has complied with the special conditions of her release, including completion of the Location Monitoring Program for 60 consecutive days.

5. Ms. Wardlow's family has organized family vacations over the last several years.

6. This year, Ms. Wardlow's family has planned a vacation to the U.S. Virgin Islands from August 4 – August 9, 2021.

7. Ms. Wardlow's would be traveling with the following family members including her sisters, Sylvia Jones and Marcia Collier, her brother in-law, Durane Jones, and her nieces and nephew, Radonna Foney, Kole Foney and Kasey Bailey.

8. Ms. Wardlow would be staying at the Winward Passage Hotel, 00804 Veterans Drive Charlotte Amali Rd., St. Thomas, St. Thomas, USVI and will return on Monday August 9, 2021.

9. There was a conference between attorneys on the motion in which the movant explained the nature of the motion and its legal basis and requested but did not obtain concurrence in the relief sought.

WHEREFORE Linda Wardlow prays that this Court grant her Emergency Motion for Travel While on Supervised Release.

Respectfully submitted,

/s/ Tere McKinney-Bundy

Tere McKinney (P71567)  
Attorney for Linda Wardlow  
500 Griswold, Ste. 2410  
Detroit, MI 48226  
(248) 808-3225

Dated: July 19, 2021

UNITED STATES DISTRICT COURT  
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**BRIEF IN SUPPORT OF LINDA WARDLOW'S EMERGENCY MOTION FOR  
TRAVEL WHILE ON SUPERVISED RELEASE**

Linda Wardlow relies on this Court's exercise of discretion in support of her Emergency Motion for Travel While on Supervised Release. However, the movant makes the Court aware that as of July 16, 2021 the United States Center for Disease Control (CDC) has updated its domestic travel advice for vaccinated individuals and such domestic travel between a U.S. territory is permissible without additional health concerns. See Attachment 1, pp 4. [https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated-guidance.html#anchor\\_1617376530945](https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated-guidance.html#anchor_1617376530945)

Respectfully submitted,

Dated: July 19, 2021

/s/ Tere McKinney  
Tere McKinney (P71567)  
Attorney for Linda Wardlow  
500 Griswold, Ste. 2410  
Detroit, MI 48226  
313.964.0400  
[mckinneylawllc@gmail.com](mailto:mckinneylawllc@gmail.com)

**CERTIFICATE OF SERVICE**

I certify that on July 19, 2021, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to Ryan A. Particka, Assistant U. S. Attorney.

/s/ Tere McKinney

Tere McKinney (P71567)  
Attorney for Linda Wardlow  
500 Griswold, Ste. 2410  
Detroit, MI 48226  
(248) 808-3225